

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re: Marjory J. Salazar, : Chapter 13
Debtor : Bankruptcy No. 20-13966-pmm

**DEBTOR'S MOTION TO MODIFY CHAPTER 13 PLAN POST-CONFIRMATION
PURSUANT TO 11 U.S.C. 1329**

Movant, Marjory J. Salazar, by and through her counsel, Brenna H. Mendelsohn, Esquire and Mendelsohn & Mendelsohn, P.C. hereby files this Motion to Modify Chapter 13 Plan Post-Confirmation and in support thereof, represents the following:

1. Movant, Marjory J. Salazar, is the debtor in the above-captioned Bankruptcy proceeding
2. On 10/02/2020, the Debtor filed a voluntary petition under Chapter 13 of the United States Bankruptcy Code; said petition being docketed to case number 20-13966-pmm in the United States Bankruptcy Court for the Eastern District of Pennsylvania.
3. The Movant's first amended Chapter 13 Plan was confirmed by this Honorable Court on 007/15/2021.
4. The Plan has been extended to 84 months due to Debtor's non-filing spouse still having trouble securing full time employment. Debtor currently has COVID-19 with on-going systems and she is missing hours and pay from her job and the primary earner.
5. There is currently a Motion to Dismiss filed by the Chapter 13 Trustee and the Plan extension due to the COVID extension would be beneficial to Debtor.

6. The proposed fourth amended Chapter 13 Plan is not less than the amount to be paid to each creditor under the Third amended Chapter 13 Plan.

7. No creditor will be prejudiced by the Fourth amended Chapter 13 Plan.

WHEREFORE, the debtor prays that this Honorable Court enter an Order confirming the Fourth Amended Chapter 13 Plan.

Respectfully Submitted,

Date: January 27, 2022

/s/ Brenna H. Mendelsohn
Brenna H. Mendelsohn, Esquire
637 Walnut Street
Reading, PA 19601